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in its capacity as authorized representative of claimant
Third Point, LLC*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case
No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

PG&E CORPORATION,

-and-

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

**THIRD POINT, LLC'S (I) OPPOSITION
TO REORGANIZED DEBTORS'
THIRTY-FOURTH SECURITIES
CLAIMS OMNIBUS OBJECTION, AND
(II) JOINDER IN RKS OPPOSITION**

[Related to Dkt. No. 14203]

**[Related to Proof of Claim Nos. 102395,
110005, and 110008]**

Financial Recovery Technologies LLC ("**FRT**"),¹ on behalf of claimant Third Point, LLC
("**Claimant**"), hereby responds to the *Reorganized Debtors' Thirty-Fourth Securities Claims*

¹ FRT is a leading technology-based services firm that helps the investment community identify eligibility, file claims, and collect funds made available in securities and antitrust class actions and other recovery opportunities worldwide. FRT filed the Claims on behalf of Claimant (each as defined herein). Claimant expressly authorized FRT to submit the Claims on its behalf pursuant to an Authorization to File (the "**ATF**"), a copy of which was submitted with the Claims. The ATF includes a Limited Power of Attorney authorizing FRT to, *inter alia*, file court submissions like this response.

1 *Omnibus Objection to Claims Adopting RKS Amendment* [Docket No. 14203] (the “**34th**
2 **Omnibus Objection**”).

3 On April 16, 2020, Claimant filed its original securities proof of claim, which appears on
4 the claims register as Proof of Claim No. 102395. Pursuant to the *Order Authorizing Amendment*
5 *and Objection Procedures for Securities Claims* [Docket No. 13934], Claimant filed amended
6 claims on October 12, 2023, which appear on the claims register as Proof of Claim Nos. 110005
7 and 110008 (collectively, Proof of Claim Nos. 102395, 110005, and 110008 are referred to as the
8 “**Claims**”). The amended Claims adopt the allegations set forth in the *Notice of Filing of RKS*
9 *Amendment Pursuant to Order of July 28, 2023* [Docket No. 14049] (the “**RKS Allegations**”).

10 On December 13, 2023, the Debtors filed the 34th Omnibus Objection, which asserts a
11 “sufficiency objection” as to each of the Claims and numerous other proofs of claim that adopted
12 the RKS Allegations.

13 In response to the 34th Omnibus Objection, Claimant hereby incorporates and adopts the
14 arguments set forth in *The RKS Claimants’ Opposition to Reorganized Debtors’ Thirty-Fourth*
15 *Securities Claims Omnibus Objection to Claims Adopting the RKS Amendment* (the “**RKS**
16 **Response**”) as if set forth in full herein. In addition, Claimant incorporates and adopts RKS’s
17 objection to the *Omnibus Request for Incorporation of Documents By Reference or Judicial Notice*
18 *[etc.]* [Docket No. 14208].

19 WHEREFORE, for all of the reasons set forth in the RKS Response, the 34th Omnibus
20 Objection should be overruled and denied, and the Claims should be allowed in their entirety.

21
22 DATED: March 15, 2024

/s/ Samuel M. Kidder

Samuel M. Kidder
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25 *Counsel for Financial Recovery Technologies LLC, in*
26 *its capacity as authorized representative of claimant*
27 *Third Point, LLC*
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